STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
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February 21, 2020

Mr. James Robertson, President
Jorgensen Forge
8531 E Marginal Way S
Seattle, WA 98108

RE: WARNING LETTER – Non-Compliance with Industrial Stormwater General Permit #WAR003231

Mr. Robertson,

On February 14, 2020, I conducted an inspection of the Jorgensen Forge facility in Tukwila, WA. This site is covered under Ecology's Industrial Stormwater General Permit (NPDES and State Waste Discharge Permit). Under this permit, you are authorized to discharge stormwater associated with industrial activity to surface waters of the state contingent upon compliance with the permit's terms and conditions.

There were areas that were not in compliance with the Industrial Stormwater General Permit at Jorgensen Forge. The enclosed report provides additional information on the violations observed and the corrective actions required to come into compliance with Permit #WAR003231.

Please be aware that formal enforcement actions are being considered for the violations described in the enclosed report. The Department of Ecology has the authority to issue formal enforcement actions including issuance of administrative orders and/or civil penalties of up to $10,000 per day per violation.

If you have any questions please contact me at bbil461@ecy.wa.gov or (425) 649-7059.

Sincerely,

Ben Billick, Senior Water Quality Inspector
Department of Ecology
Water Quality Program

Enclosed: February 14, 2020 Inspection Report

Ecc: Wayne Turk, Jorgensen Forge
Bradley Marten, Marten Law
Ryan Bixby, SoundEarth Strategies
Mindy Graddon, SoundEarth Strategies
Erika Vossbeck, SoundEarth Strategies
Rachel McCrea, Dept. of Ecology
Amy Jankowiak, Dept. of Ecology
Maureen Sanchez, Dept. of Ecology
Katy Harvey, Dept. of Ecology
Drew Imke, Dept. of Ecology
Tamara Cardona-Marek, Dept. of Ecology
Ramen Iyer, Dept. of Ecology
Erik Snyder, Dept. of Ecology
Jessica Huybregts, Dept. of Ecology
Evan Dobrowski, Dept. of Ecology
Ron Lavigne, WA State Attorney General's Office
Nels Johnson, WA State Attorney General's Office
Elly Hale, US EPA Region 10
Brad Martin, US EPA Region 10
Lynn Miranda, City of Tukwila
Russell Betteridge, City of Tukwila
Lauri Dunning, City of Tukwila
Andrew Tsoming, City of Tukwila

STORMWATER COMPLIANCE INSPECTION REPORT

State of Washington Department of Ecology
3190 – 160th Avenue SE, Bellevue, WA 98008-5452

WADOE Stormwater

Phone: (425) 649-7000
FAX: (425) 649-7098

Section A: General Data

Inspection Date	NPDES Permit #	County	Receiving Waters	Inspector(s)	Facility Type
2/14/2020	**WAR003231**	King	Duwamish River	Ben Billick & Evan Dobrowski	Industrial

Discharges to: Surface Water ☒ Ground Water ☐ **ANNOUNCED** Inspection

Section B: Facility Data

Name and Location of Site Inspected	Lat & Long	Entry Time	Permit Effective Date
Jorgensen Forge 8531 E Marginal Way S Seattle, WA 98108	Latitude: 47.52652 Longitude: -122.304153	1310h	01/01/2020
		Exit Time 1500h	Permit Expiration Date 12/31/2024

On-Site Representative(s): Name(s)/Title(s)/Contact number(s) or E-mail
Wayne Turk, Environmental Project Administrator
Phone: (206) 255-8177, Email: wturk@jorgensenforge.com

Responsible Official(s):
James Robertson, President
8531 E Marginal Way S
Seattle, WA 98108
Phone: (206) 6767-9221

Additional Participants:

	Yes	No
Samples Taken?	☐	☒
Photos Taken?	☒	☐

Section C: Summary of Findings/Comments

BACKGROUND

Jorgensen Forge is covered under Ecology's Industrial Stormwater General Permit (ISGP #WAR003231). Jorgensen Forge filed for bankruptcy in 2016. The facility was subsequently purchased by Star Forge LLC, but continued to operate under the name Jorgensen Forge (the facility is therefore referred to as Jorgensen Forge in this report). ISGP coverage was also transferred to Star Forge after they purchased the site. In 2018, Star Forge announced plans to cease operations at Jorgensen Forge and sell the facility. Ecology Inspector Ben Billick initiated discussions with Jorgensen Forge about their plans for vacating the site, and the potential NPDES permitting requirements associated with those plans, during an inspection on July 9, 2019. At that time, Star Forge was unsure whether or not they would be conducting demolition activities, or if that work would be completed by the future owner. In October 2019, B. Billick learned through Ecology's Hazardous Waste and Toxics Cleanup Programs that Star Forge would be moving forward with demolition of the Jorgensen Forge facility prior to sale. B. Billick contacted representatives from the company and their consultant, SoundEarth Strategies, to discuss potential Construction Stormwater Permit Coverage (CSWGP) for the facility. Annika Wallendahl from SoundEarth Strategies contacted B. Billick on behalf of Star Forge, and informed him that prior to conducting any demolition of structures, Jorgensen Forge would fill and cap all interior pits and pave over all exposed areas inside the facility. In this way, A. Wallendahl stated that they would prevent stormwater exposure for the areas inside the buildings. In an email to Jorgensen Forge and SoundEarth Strategies personnel on October 23, 2019, B. Billick informed them that if they conformed to the plan as described by A. Wallendahl, than the work would not require CSWGP coverage. B. Billick also requested notification if his understanding of those plans was incorrect in any way, or if the plans were changed, as that could impact the NPDES permitting requirements.

On February 12, 2020, Erika Vossbeck with SoundEarth Strategies (consultant for Star Forge LLC at the Jorgensen Forge property) submitted a report to Ecology's Environmental Report Tracking System (ERTS). This report, ERTS #695609, provided notification that PCBs were detected in stormwater discharge from the facility on January 22, 2020. According to the report, Jorgensen Forge learned of the PCB exceedance on February 8, 2020. A written, follow-up report submitted to Ecology on February 13, 2020 stated that the concentration of PCBs in the discharge was 0.059 µg/L. This is the first PCB detection that the facility has had since beginning quarterly PCB monitoring in third quarter 2016, indicating that site conditions have changed in a manner that has affected the quality of the facility's stormwater discharge.

The inspection summarized in this report was announced in advance. On February 14, 2020, prior to arriving on-site, Ecology Inspector Ben Billick notified Wayne Turk with Jorgensen Forge and Ryan Bixby with SoundEarth Strategies that an inspection of the site would be conducted that day. Following the inspection, B. Billick learned that questions had been raised by Star Forge and their legal counsel, Marten Law, regarding Ecology's presence on-site and the agency's authority to conduct this inspection. To avoid potential future confusion, Ecology would like to make it clear that Jorgensen Forge's ISGP coverage grants Ecology the right to enter the property at reasonable times for the purposes of inspecting the facility or

conducting sampling to oversee permit compliance (see ISGP condition G3). Please be aware that Ecology is not required to provide advance notice for these inspections, and that notice may not be provided when future site visits are conducted.

The purpose of this inspection was to follow-up on the reported PCBs in Jorgensen Forge's treated stormwater discharge, determine the facility's compliance with the ISGP, and provide technical assistance as appropriate. This facility discharges stormwater to the Lower Duwamish Waterway superfund site, and is itself a contaminated site undergoing cleanup under the Model Toxics Control Act due to soil and groundwater contamination.

INSPECTION/OBSERVATIONS

Upon arrival, Ecology Inspectors Ben Billick and Evan Dobrowski met with Wayne Turk, Environmental Project Administrator for Jorgensen Forge. We discussed the purpose of our visit, reviewed the facility Stormwater Pollution Prevention Plan (SWPPP), and conducted an inspection of the site.

- Jorgensen Forge's SWPPP was last updated in 2017 (Photo 001), when the facility was still an operating forge. Forging operations on-site have ceased and all activities currently taking place at the property are related to demolition/abatement. The potential pollutant sources and stormwater best management practices (BMPs) associated with demolition activities are, in many cases, different than the pollutant sources and BMPs that applied to the facility when it was actively metal forging. Consequently, the SWPPP that is in use on-site does not accurately characterize current site conditions, nor does it include all appropriate BMPs. B. Billick informed W. Turk that the facility's SWPPP must be updated to reflect changes in industrial activities, potential pollutant sources, applicable BMPs, etc. B. Billick also informed W. Turk that Ecology re-issued the ISGP on January 1, 2020, and that SWPPPs for all permitted facilities were required to be updated by January 30, 2020 to comply with changes in the new permit (see ISGP condition S3.A.3.c.).

- Demolition activities have begun on multiple buildings on-site (Photos 002 - 004). Based on the condition of the buildings at the property, demolition activities completed to date appear to have included, but have not necessarily been limited to, removal of roof panels, walls, concrete flooring and/or other concrete structures, insulation, windows, doors, and interior fixtures (e.g. electrical and plumbing components). We observed standing water on the ground inside the footprint of several former buildings that have been partially demolished (Photo 005). W. Turk confirmed that this water was accumulated stormwater.

- Exposed soils are present inside multiple buildings on-site. Additionally, surfaces throughout the interior of much of the facility are coated in a layer of fine dust that the facility refers to as "process waste" (Photo 006). Katy Harvey with Ecology's Hazardous Waste Program has informed B. Billick that this "process waste" designates as a Washington State dangerous waste. Because roof panels and walls have been removed from several buildings on-site, some areas containing "process waste" and exposed soil are now exposed to precipitation and have the potential to contaminate stormwater. The ISGP requires that secondary containment be provided for "all hazardous substances, petroleum/oil liquids, and other chemical solid or liquid materials that have the potential to contaminate stormwater." The soils on-site are known to be contaminated and the "process waste" designates as a dangerous waste, which means that Jorgensen Forge is required to provide secondary containment for any areas where potentially contaminated soils or "process waste" are exposed to precipitation or otherwise have the potential to contaminate stormwater runoff.

    - Please note that Jorgensen Forge could have avoided triggering the secondary containment requirement for these materials if they had followed the applicable BMP for demolition activities from Ecology's Stormwater Management Manual for Western Washington (BMP S438, SWMM Volume IV). BMP S438 for construction demolition activities directs facilities to "identify, remove, and properly dispose of hazardous substances from the building before beginning construction demolition activities that could expose them to stormwater."

- Throughout the site, containers of hazardous substances, petroleum products, and other chemical liquid and solid materials with the potential to contaminate stormwater were stored without secondary containment. The contents of these containers could not all be positively identified because many containers were unlabeled and, in some cases, W. Turk stated that the labels that were present on the containers were likely not accurate. Containers ranged in size and included 5-gallon buckets, spray applicators for liquid chemicals, 55-gallon drums, 250-gallon totes, and sandbags that held solid chemical products (Photos 007 – 012). Secondary containment is required for any of these containers that are stored outside, for containers stored inside the footprint of former buildings that have been partially demolished allowing stormwater to enter the former structure, and for chemical containers stored inside of buildings where leaked/spilled material could potentially make it outside (such as through overland flow or track out).

- Unused secondary containment pallets and trays were observed in multiple locations on-site (Photos 012 – 014). B. Billick informed W. Turk that these BMPs should be used for storing the various chemical containers on-site that did not have secondary containment. Two secondary containment devices inside footprint the former melt shop warehouse, which is missing its roof and walls, held accumulated stormwater with visible oil sheen and chemical

residue (Photo 014). One of the two secondary containment devices was filled to the brim and may have overflowed onto the ground, which was wet in the surrounding area. B. Billick informed W. Turk that the accumulated water in these secondary containment devices must be properly disposed of, and could not be allowed to discharge off-site, to the storm system, or to surface waters.

- Spill kits were present on-site, but they were not well distributed throughout the property. The majority of the spill kits that we observed were located inside of the aluminum heat treat building on the east side of the site (Photo 013). Storing the majority of the spill kits in this single location makes it more difficult for facility personnel to respond immediately in the event of a leak or spill, as required by the ISGP.
- Evidence of chemical and petroleum leaks and spills was observed in multiple locations on-site where spilled material could result in stormwater contamination. Leak/spill issues that we observed included, but were not necessarily limited to, the following:
    - Oil sheen on standing water within the footprint of the former melt shop warehouse (Photo 007). The area with the oil sheen was located directly beneath a ceiling-mounted lift, which may have been the source of the leak. B. Billick informed W. Turk that if the lift is identified as the source of the sheen, than the ISGP would require that containment be provided for the leak until such time as the equipment can be repaired or removed from the site. Note that the roof panels and walls have all been removed from the melt shop warehouse and the interior of this building is now exposed to precipitation (Photo 002).
    - An unidentified chemical film was observed on top of standing water in two locations on-site exposed to rainfall: 1) near the old transformer pad in the outdoor yard that occupies the northwestern portion of the facility, and 2) on the east side of the forge shop area near the aluminum heat treat building (Photo 015). The water with the chemical film near the heat treat building was located up gradient of a catch basin, and we observed staining on the ground that indicated water from the puddle with the chemical film had discharged to the catch basin (Photo 016).
    - Multiple spills were observed inside of the laboratory building, which was being used to hold a number of chemical containers that were mostly stored outside of secondary containment. Spills included puddles and staining from petroleum products, and a yellow/green oily substance that we observed on top of standing water directly inside of the door to the laboratory building (Photos 012 & 017). Though these chemicals and the associated spills were all located inside of the laboratory building, which had not yet been demolished, there is still the potential for spilled material to migrate outside (as track out on employee footwear, for example).
    - Two of the excavators with potential exposure to precipitation were actively leaking onto the ground (Photo 018).
- Waste debris from demolition activities was not being stored in a manner that minimizes exposure to precipitation and reduces the potential for contamination of stormwater runoff. Issues related to waste storage and handling on-site included, but were not necessarily limited to, the following:
    - Uncovered piles of scrap metal, glass, and other debris removed from buildings were left on the ground outdoors (Photos 003 & 019).
    - Components from the facility's electrical system were left on the ground outdoors (Photo 020).
    - A large pile of wire frames was on the ground outdoors (Photo 021). These wire frames previously held the air filters in the melt shop baghouse, and could potentially contain residual chemicals from when they were used inside of the baghouse.
    - Piles of metal turnings mixed with soil/debris that appeared to contain an oily residue were left on the ground outdoors (Photos 022 & 023).
    - Multiple dumpsters on-site were uncovered, despite not actively being used at the time of the inspection. One uncovered dumpster contained galbestos siding, plastic sheeting used as containment during demolition activities, and an unidentified dark grey dust that resembled the "process waste" that is spread throughout the interior of the buildings (Photo 024 & 25). We observed water leaking from the back of this dumpster onto the ground (Photo 026).
    - Particulate debris from demolition activities was observed on the ground exposed to precipitation, both inside and outside of the facility (Photos 027 & 028). Particulate debris observed in areas exposed to precipitation included, but was not necessarily limited to, paint chips, insulation, and pieces of miscellaneous metal (note that the exposed "process waste" is not included in this list because it is discussed elsewhere in the report).

- The floor of one former building that has had the roof panels and walls removed was previously painted. The paint coat on the floor has degraded and the paint was flaking off (Photo 029). This chipping paint has the potential to contaminate stormwater and could also be tracked to other areas of the facility by vehicles and equipment.
- Vehicles/equipment and personnel exiting the buildings and the footprints of former buildings have the potential to track out contaminated soil or "process waste." No BMPs were installed to prevent track out from the buildings on vehicle/equipment tires or employee footwear. Evidence of potential track out was observed in at least one location (Photo 030).
- One of the pits in the decommissioned oil storage area on the east side of the site was uncovered and accumulating stormwater. Unidentified white particles were floating on top of the accumulated water (Photo 031). B. Billick recommended to W. Turk that the facility cover this pit to prevent additional stormwater accumulation. B. Billick informed W. Turk that this water is not permitted to be discharged to the storm system, and will either need to be hauled off-site for disposal or discharged to sanitary sewer with approval of the local sewer authority. By leaving the pit uncovered, Jorgensen Forge is creating the potential for additional stormwater accumulation, which will likely increase the cost of disposal.
- W. Turk informed B. Billick that Jorgensen Forge would be installing additional stormwater treatment in response to the PCB detection.

Section D: Compliance Requirements and Recommendations

Violations and Required Corrective Actions

- **The discharge of PCBs from Jorgensen Forge constitutes a violation of Section 90.48.080 Revised Code of Washington (RCW 90.48.080), which states "It shall be unlawful for any person to throw, drain, run, or otherwise discharge into any of the waters of this state, or to cause, permit or suffer to be thrown, run, drained, allowed to seep or otherwise discharged into such waters any organic or inorganic matter that shall cause or tend to cause pollution of such waters according to the determination of the department, as provided for in this chapter."** Immediately implement all necessary BMPs to prevent the discharge of pollutants to waters of the state. Ensure that the facility complies with all requirements of the Industrial Stormwater General Permit (ISGP) and implements applicable BMPs from the Stormwater Management Manual for Western Washington (SWMM, 2019).
- **Jorgensen Forge failed to select and use best management practices (BMPs) that are consistent with the 2019 SWMM, which is a violation of ISGP condition S3.A.2.a. For example, Jorgensen Forge failed to conduct demolition activities in manner that is consistent with BMP S438 for construction demolition from SWMM Volume IV.** Complete the following corrective actions to comply with this permit requirement:
  - Immediately review the SWMM to ensure that the BMPs implemented on-site are consistent with the specifications in the SWMM. If inconsistencies are identified, Jorgensen Forge should update the BMPs used on-site and/or implement additional BMPs to conform to the SWMM. If Jorgensen Forge deviates from the BMP specifications in the SWMM, the Stormwater Pollution Prevention Plan (SWPPP) must document how the selected BMPs are demonstrably equivalent to those contained in the SWMM, in accordance with ISGP condition S3.A.2.d.
  - In accordance with ISGP condition S3.A.3.a.ii, update the SWPPP within 30 calendar days of receipt of this report to include all applicable BMPs from the SWMM, and/or to document how selected BMPs are demonstrably equivalent to those contained in the SWMM.
- **Jorgensen Forge failed to modify the facility SWPPP when there was a change in the operation and maintenance of the facility that significantly changed the nature of pollutants discharged, which is a violation of ISGP condition S3.A.3.b.** Complete the following corrective actions to comply with this permit requirement:
  - In accordance with ISGP condition S3.A.3.a.ii, update the SWPPP within 30 calendar days of receipt of this report to comply with all requirements in permit condition S3. The SWPPP must accurately characterize the nature of the activities conducted on-site, the potential pollutants and pollutant sources which may be exposed to precipitation, and the BMPs implemented at the facility.
  - In accordance with ISGP condition S9.D.3, submit the updated SWPPP to Ecology Inspector Ben Billick by no later than the close of business on March 23, 2020.
- **Jorgensen Forge failed to update their SWPPP to be consistent with the 2020 ISGP by January 30, 2020, which is a violation of ISGP condition S3.A.3.c.** In accordance with ISGP condition S3.A.3.a.ii, review and

update the SWPPP within 30 calendar days of receipt of this report to ensure it complies with all requirements in the 2020 ISGP.

- **Jorgensen Forge failed to implement adequate housekeeping BMPs for ongoing maintenance and cleanup of areas which may contribute pollutants to stormwater discharges, which is a violation of ISGP condition S3.B.4.b.i.2.** Immediately implement improved BMPs for the cleanup and removal of debris in all areas exposed to precipitation, including areas inside buildings that are now exposed to precipitation. This includes cleanup and removal of paint chips, loose paint on surfaces exposed to precipitation, insulation debris, metal particulates, broken portions of walls and roof panels, etc.

- **Jorgensen Forge failed to identify and control all sources of dust (e.g. "process waste" dust) to minimize stormwater contamination from the deposition of dust on areas exposed to precipitation. This is a violation of ISGP condition S3.B.4.b.i.2.b.** Immediately implement improved BMPs to control dust and prevent the exposure of dust to precipitation. Due to the removal of roof panels and walls from several buildings, Jorgensen Forge has exposed "process waste" dust in many areas to precipitation. Ecology's recommended BMP for addressing this violation and complying with the ISGP is to install temporary covers (e.g. tarps or plastic sheeting) to replace all missing roof panels and walls until such time as all waste from abatement/demolition activities are no longer located in the footprint of these former structures.

- **Jorgensen Forge failed to keep all dumpsters under cover or fit with a storm resistant lid that must remain closed when not in use, which is a violation of ISGP condition S3.B.4.b.i.2.d.** Immediately ensure that all dumpsters on-site are stored under cover or fit with a lid that is kept closed when not in use.

- **Jorgensen Forge failed to clean up all spills and leaks immediately to prevent the discharge of pollutants, which is a violation of ISGP condition S3.B.4.b.i.3.d.** Ensure that all leaks and spills of liquid or solid chemical and petroleum products are cleaned up immediately. In order to facilitate immediate leak/spill cleanup, Ecology strongly recommends that Jorgensen Forge begin regularly inspecting the site for housekeeping issues. Ecology also recommends that Jorgensen Forge distribute spill kits throughout the site and inform all on-site personnel of the spill kit storage locations and the facility's spill response procedures.

- **Jorgensen Forge failed to provide secondary containment for all hazardous substances, petroleum/oil liquids, and other chemical solid or liquid materials that have the potential to contaminate stormwater, which is a violation of ISGP condition S3.B.4.b.i.4.a.** Secondary containment means storing hazardous substances on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater, or use double-walled tanks. Immediately provide secondary containment for all potentially hazardous substances in areas of the site with potential stormwater exposure (including indoor areas where hazardous substances could make it outdoors through track out and/or as the result of a spill).
    - Please note that the secondary containment requirement applies to areas which contain "process waste" dust that could potentially contaminate stormwater. If full secondary containment cannot be provided for areas with "process waste" dust, than Jorgensen Forge should eliminate all potential stormwater exposure for these areas. This can be accomplished by installing temporary cover on all open roofs and walls along with improved BMPs to prevent track out from areas containing "process waste."

- **Jorgensen Forge failed to prevent precipitation from accumulating in containment areas with a roof or equivalent structure or implement a plan to manage and dispose of accumulated water if a containment area cover is not practical. This is a violation of ISGP condition S3.B.4.b.i.4.b.** Complete the following corrective actions to comply with this permit requirement:
    - Immediately ensure that containment areas are covered and/or that procedures are implemented to properly manage and dispose of any water that accumulates in containment areas.
    - Properly dispose of accumulated water inside the secondary containment trays in the melt shop warehouse. This water cannot be allowed to discharge off-site, to the storm system, or to surface waters.

- **Jorgensen Forge failed to use drip pans and absorbents under or around leaky vehicles and equipment on-site, which is a violation of ISGP condition S3.B.4.b.i.4.h.** Immediately provide drip pans, absorbents, or equivalent containment for all leaking vehicles and equipment on-site. This applies to leaking vehicles in any portion of the site with exposure to precipitation, including inside of buildings with missing roof panels or walls.

- **Jorgensen Forge failed to implement BMPs to minimize exposure of industrial materials and activities, such as cleaning and disposal areas, to precipitation and runoff. Additionally, by removing roof panels and walls from buildings prior to completing cleanup and soil stabilization activities, Jorgensen Forge actively exposed these areas to precipitation. This is a violation of ISGP condition S3.B.4.b.ii.2.** Complete the following corrective actions to comply with this permit requirement:

- Immediately implement BMPs to minimize the exposure of pollutants in all formerly indoor areas that now have missing roof panels or walls. Ecology strongly recommends that Jorgensen Forge install temporary covers (e.g. tarps or plastic sheeting) to replace all missing roof panels and walls until such time as all waste from abatement/demolition activities are no longer located in the footprint of these former structures.
- Immediately ensure that all waste and recyclable materials awaiting disposal are stored in covered dumpsters and not left in areas exposed to precipitation. This includes, but is not necessarily limited to, scrap metal, metal turnings, demolition debris, waste electrical equipment, and the metal frames which previously housed the air filters in the facility's bag house.

- **Jorgensen Forge failed to implement BMPs necessary to prevent the erosion of soils and other earthen materials, control off-site sedimentation, and prevent violations of water quality standards, which is a violation of ISGP condition S3.B.4.b.v.** Complete the following corrective actions to comply with this permit requirement:
  - Implement BMPs to control track out of soil or "process waste" at all locations where vehicles, equipment, or personnel exit the buildings on-site. This includes BMPs to address track out on both vehicle/equipment tires and on employee footwear. BMPs may be structural (e.g. rumble plates for vehicle/equipment tires) and/or operational (e.g. requiring employees to wear covers over their shoes that can be removed upon exiting the buildings).
  - Immediately implement BMPs to minimize the exposure of unstabilized soils within the footprint of buildings with missing roof panels or walls. Ecology strongly recommends that Jorgensen Forge install temporary covers (e.g. tarps or plastic sheeting) to replace all missing roof panels and walls until such time as all waste from abatement/demolition activities are no longer located in the footprint of these former structures.

Additional Compliance Requirements

- **ISGP condition S9.D.3.** requires that Permittees make all plans, documents, and records required by this permit immediately available to Ecology. In accordance with **ISGP condition S9.D.3.**, submit the following records to Ecology Inspector Ben Billick immediately:
  - All waste designation records, including laboratory analytical data, for hazardous wastes and dangerous wastes that are currently present on-site or were present on-site prior to beginning demolition and abatement activities.
  - All laboratory analytical data for any stormwater discharge monitoring conducted from November 1, 2019 to present.
  - All available information related to the lead content of paint that was used on or in the buildings on-site.

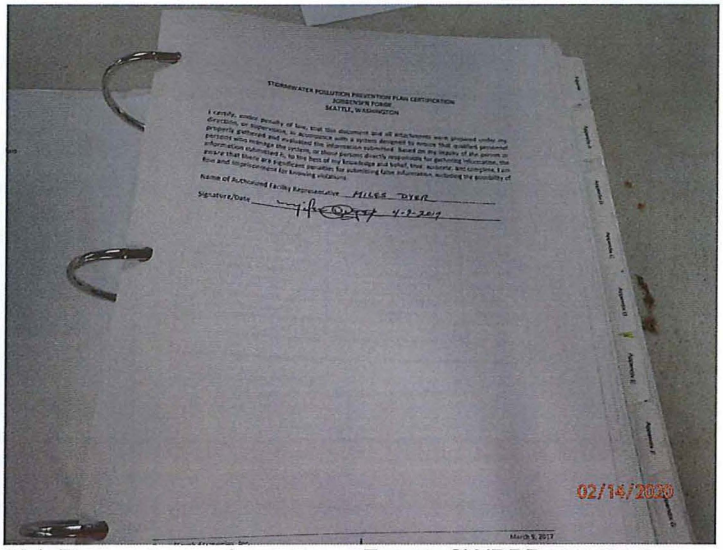
For questions about this report, please contact Ecology Inspector Ben Billick at bbil461@ecy.wa.gov, (425) 649-7059, or Dept. of Ecology, Water Quality Program, 3190 160th Ave SE, Bellevue, WA. 98008.

For assistance with any of these compliance issues or recommendations regarding Best Management Practices see the Stormwater Management Manual for Western Washington, volumes IV and V (SWMM). To obtain a copy of the SWMM you may go to Ecology's website at: http://www.ecy.wa.gov/programs/wq/stormwater/manual.html

Please be aware that formal enforcement actions are being considered for the violations described in this report. The Department of Ecology has the authority to issue formal enforcement actions including issuance of orders and civil penalties of up to $10,000 per day per violation for violations of your NPDES permit and/or state laws and regulations.

2/21/2020 Date	Reviewed and approved by: 2/21/20 Date
Ben Billick Senior Water Quality Inspector Department of Ecology, Water Quality Program	Rachel McCrea Northwest Regional Office Section Manger Department of Ecology, Water Quality Program

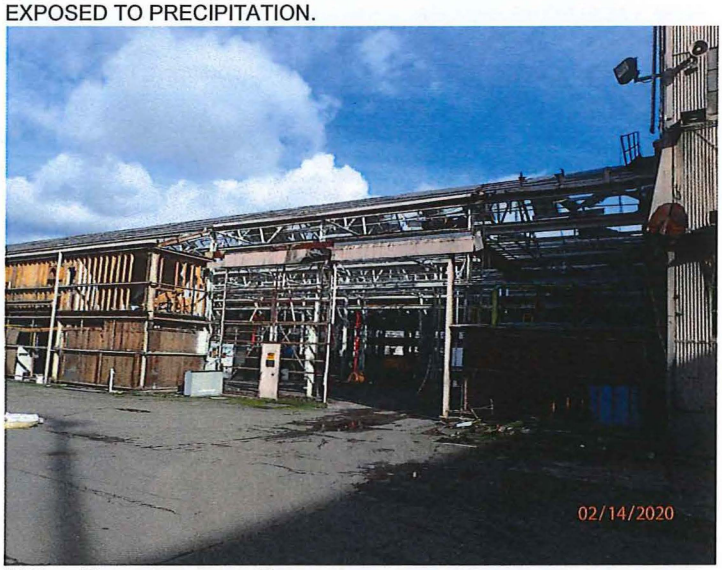
PHOTO ADDENDUM – JORGENSEN FORGE 2/14/2020



001 **DESCRIPTION:** JORGENSEN FORGE SWPPP SIGNATURE PAGE SHOWING THAT THE PLAN WAS LAST UPDATED IN 2017.

002 **DESCRIPTION:** DEMOLITION HAS BEGUN ON THE FORMER MELT SHOP WAREHOUSE BUILDING. ROOF PANELS AND WALLS HAVE BEEN REMOVED AND INTERIOR OF BUILDING IS NOW EXPOSED TO PRECIPITATION.

003 **DESCRIPTION:** DEMOLITION HAS BEGUN ON MULTIPLE BUILDINGS ON-SITE. PHOTOS SHOWS BUILDING WITH SOME WALLS, INSULATION, AND WINDOWS REMOVED. DEBRIS FROM DEMOLITION PILED ON GROUND ADJACENT TO BUILDING.

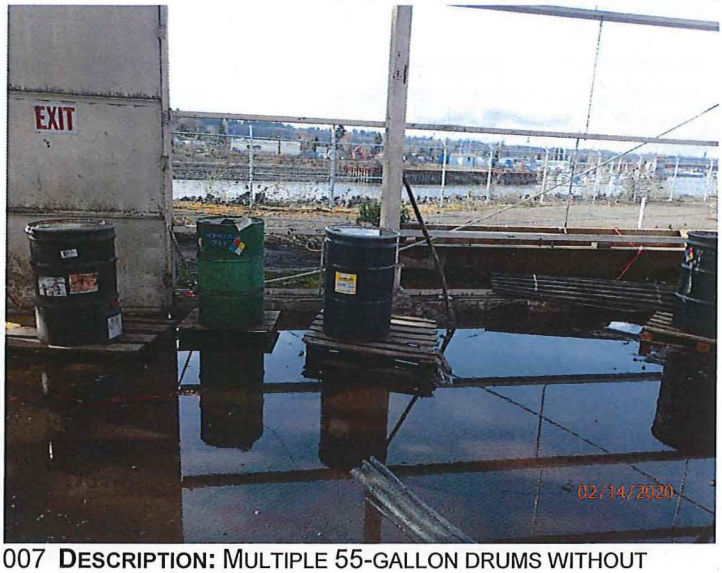


004 **DESCRIPTION:** DEMOLITION HAS BEGUN ON MULTIPLE BUILDINGS ON-SITE. PHOTO SHOWS BUILDING WITH ROOF PANELS, WALLS, INSULATION, WINDOWS, AND DOORS REMOVED. INTERIOR OF BUILDING IS NOW EXPOSED TO PRECIPITATION.

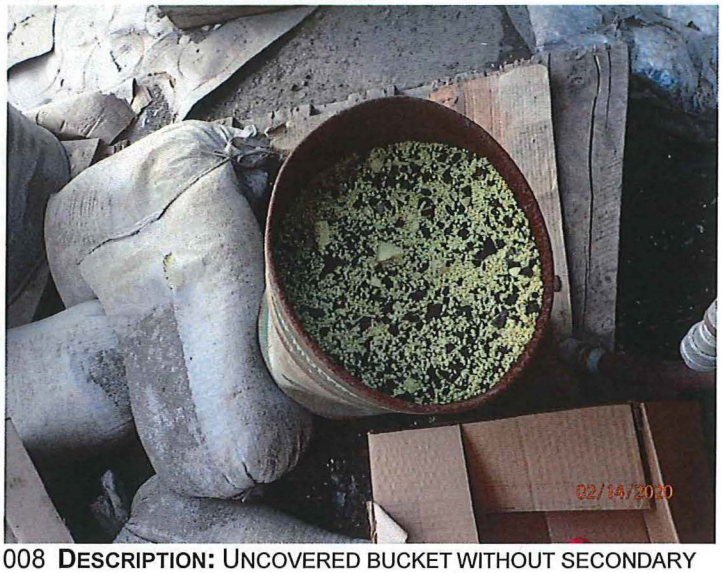
005 **DESCRIPTION:** ACCUMULATED STORMWATER ON GROUND INSIDE OF BUILDING. THE GROUND IN THIS AREA IS COVERED IN "PROCESS WASTE" THAT DESIGNATES AS A DANGEROUS WASTE.

006 **DESCRIPTION:** DUST ON GROUND INSIDE OF BUILDINGS IS "PROCESS WASTE" THAT DESIGNATES AS A DANGEROUS WASTE.

PHOTO ADDENDUM – JORGENSEN FORGE 2/14/2020



007 **DESCRIPTION:** MULTIPLE 55-GALLON DRUMS WITHOUT SECONDARY CONTAINMENT INSIDE THE FOOTPRINT OF THE FORMER MELT SHOP WAREHOUSE BUILDING. TWO DRUMS SHOWN WERE LABELED AS DANGEROUS WASTE, ONE DRUM WAS LABELED AS ANTIFREEZE THOUGH W. TURK STATED THAT THIS LABEL WAS INCORRECT. OIL SHEEN PRESENT ON THE STANDING WATER ON THE GROUND INSIDE THIS BUILDING.

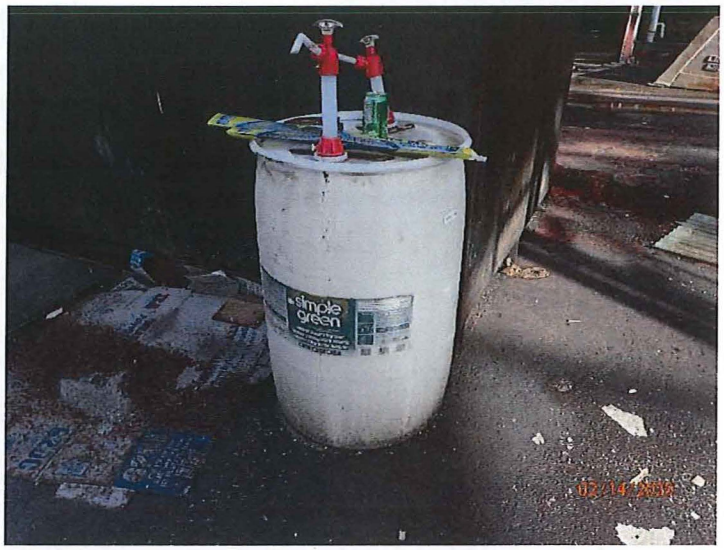


008 **DESCRIPTION:** UNCOVERED BUCKET WITHOUT SECONDARY CONTAINMENT HOLDING UNIDENTIFIED YELLOW AND BLACK CHEMICAL SOLIDS. THE SANDBAGS ON THE LEFT SIDE OF THE BUCKET ALSO HELD THE YELLOW CHEMICAL SOLIDS. W. TURK STATED THAT HE THOUGHT THE YELLOW CHEMICAL SOLIDS MIGHT BE SULFUR, BUT WAS UNSURE ABOUT THE BLACK CHEMICAL SOLIDS.

009 **DESCRIPTION:** OPEN BUCKET WITH AN OILY LIQUID LAYING ON ITS SIDE. BUCKET EXPOSED TO STORMWATER WITH NO SECONDARY CONTAINMENT.

010 **DESCRIPTION:** MULTIPLE 5-GALLON BUCKETS AND LIQUID CHEMICAL SPRAY APPLICATORS SITTING OUTSIDE WITHOUT SECONDARY CONTAINMENT.

PHOTO ADDENDUM – JORGENSEN FORGE 2/14/2020



011 **DESCRIPTION:** 55-GALLON DRUM OF SIMPLE GREEN WITHOUT SECONDARY CONTAINMENT INSIDE THE FOOTPRINT OF A FORMER BUILDING WITH MISSING ROOF PANELS.

012 **DESCRIPTION:** 5-GALLON BUCKETS AND 250-GALLON TOTES OF MISCELLANEOUS CHEMICALS AND PETROLEUM PRODUCTS WITHOUT SECONDARY CONTAINMENT INSIDE LABORATORY BUILDING. SPILLS ON GROUND THROUGHOUT THIS ROOM. THOUGH THESE CHEMICALS ARE INDOORS, CONTAINMENT SHOULD STILL BE PROVIDED DUE TO THE POTENTIAL FOR SPILLS THAT COULD MAKE IT OUTSIDE. UNUSED SECONDARY CONTAINMENT PALLET IN FOREGROUND.

013 **DESCRIPTION:** UNUSED SECONDARY CONTAINMENT PALLETS INSIDE ALUMINUM HEAT TREAT BUILDING. THE CONTAINERS ON TOP OF THE PALLET ARE SPILL KITS WHICH WERE CONCENTRATED IN THIS BUILDING. ECOLOGY RECOMMENDS DISTRIBUTING SPILL KITS THROUGHOUT THE SITE TO FACILITATE SPILL CLEANUP ACTIVITIES.

014 **DESCRIPTION:** TWO UNUSED SECONDARY CONTAINMENT TRAYS IN THE MELT SHOP WAREHOUSE BUILDING THAT WERE FILLING UP WITH STORMWATER WHICH HAD EVIDENCE OF SHEEN AND CHEMICAL RESIDUE. BLACK TRAY WAS FILLED TO THE BRIM WITH ACCUMULATED STORMWATER AND MAY HAVE OVERFLOWED. THIS WATER CANNOT BE ALLOWED TO DISCHARGE OFF-SITE TO THE STORM SYSTEM, OR TO SURFACE WATERS.

PHOTO ADDENDUM - JORGENSEN FORGE 2/14/2020

015 **DESCRIPTION:** UNIDENTIFIED CHEMICAL FILM ON TOP OF STANDING WATER ON WEST SIDE OF SITE NEAR THE ALUMINUM HEAT TREAT BUILDING. NOTE WATER STAINING ON PAVEMENT FROM PUDDLE TOWARD VEHICLE TIRE IN BACKGROUND.

016 **DESCRIPTION:** CATCH BASIN ON THE OPPOSITE SIDE OF THE VEHICLE WITH TIRE SHOWN IN PHOTO 015. NOTE WATER STAINING LEADING FROM THE VEHICLE TO THE CATCH BASIN. THIS IS EVIDENCE THAT THE STANDING WATER WITH THE CHEMICAL FILM HAS DISCHARGED TO THE SITE STORM SYSTEM.

017 **DESCRIPTION:** UNIDENTIFIED CHEMICAL SPILL INSIDE OF THE LABORATORY BUILDING. SPILLED CHEMICALS COULD MAKE IT OUTSIDE AS A RESULT OF TRACK OUT ON FOOTWEAR.

018 **DESCRIPTION:** STAINING ON GROUND FROM LEAKING EXCAVATOR (RED ARROW).

019 **DESCRIPTION:** PILE OF SCRAP METAL LEFT ON THE GROUND OUTSIDE.

020 **DESCRIPTION:** COMPONENTS FROM THE FACILITY'S ELECTRICAL SYSTEM LEFT ON THE GROUND OUTSIDE.

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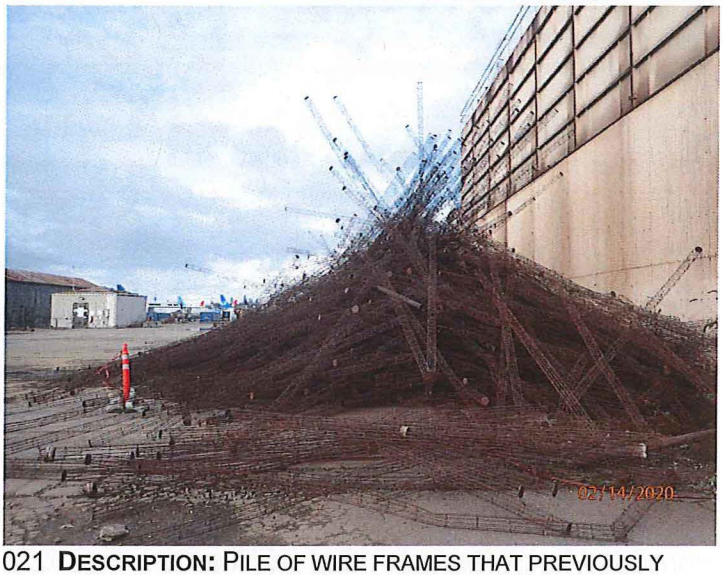
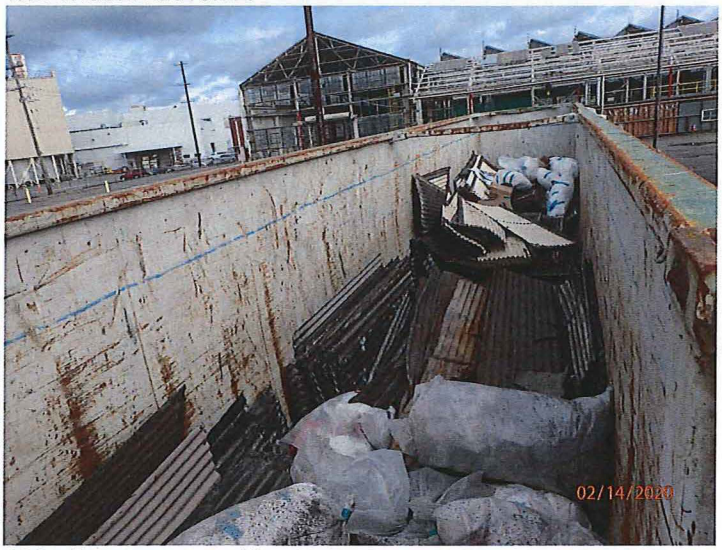


021 **DESCRIPTION:** PILE OF WIRE FRAMES THAT PREVIOUSLY HELD AIR FILTERS IN THE MELT SHOP BAGHOUSE LEFT ON THE GROUND OUTSIDE.

022 **DESCRIPTION:** PILE OF METAL TURNINGS MIXED WITH SOIL/DEBRIS THAT APPEARED TO CONTAIN OILY RESIDUE LEFT ON THE GROUND OUTSIDE.

023 **DESCRIPTION:** CLOSE UP OF THE PILE OF METAL TURNINGS AND SOIL/DEBRIS FROM PHOTO 022.



024 **DESCRIPTION:** UNCOVERED DUMPSTER WITH GALBESTOS SIDING AND PLASTIC SHEETING USED AS CONTAINMENT DURING DEMOLITION ACTIVITIES.

025 **DESCRIPTION:** UNIDENTIFIED GRAY DUST THAT RESEMBLED THE "PROCESS WASTE" INSIDE UNCOVERED DUMPSTER.

026 **DESCRIPTION:** WATER WAS LEAKING FROM THE BACK OF THE UNCOVERED DUMPSTER SHOWN IN PHOTOS 024 & 025 DURING THE INSPECTION.

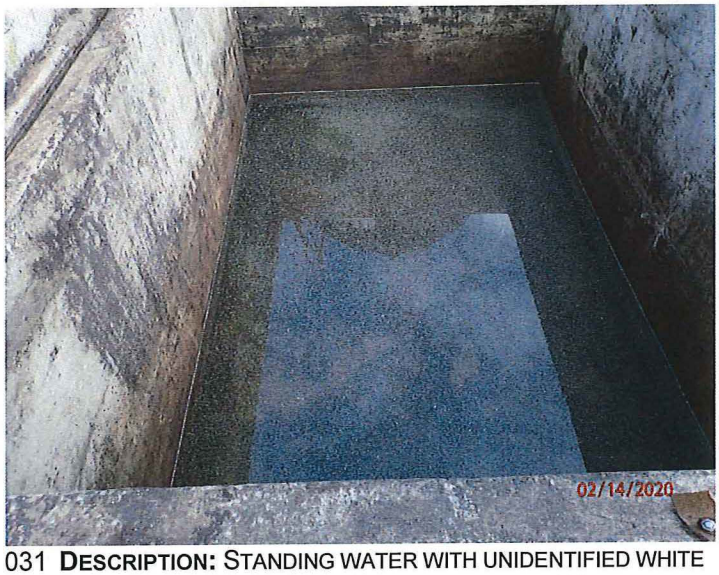
PHOTO ADDENDUM – JORGENSEN FORGE 2/14/2020

027 **DESCRIPTION:** PARTICULATE DEBRIS INCLUDING PAINT CHIPS, INSULATION, AND METAL FRAGMENTS ON THE GROUND OUTSIDE.

028 **DESCRIPTION:** PAINT CHIPS ON THE GROUND IN THE FOOTPRINT OF A FORMER BUILDING THAT HAS HAD ROOF PANELS AND WALLS REMOVED AND IS NOW EXPOSED TO PRECIPITATION.

029 **DESCRIPTION:** PAINT FLAKING OFF OF THE FLOOR IN THE FOOTPRINT OF A FORMER BUILDING THAT HAS HAD ROOF PANELS AND WALLS REMOVED AND IS NOW EXPOSED TO PRECIPITATION.

030 **DESCRIPTION:** NO TRACK OUT CONTROL BMPS AT EXIT FROM BUILDING. TIRE TRACKS (RED ARROW) OUTSIDE BUILDING, POTENTIALLY AS A RESULT OF TRACK OUT OF MATERIALS FROM INSIDE.



031 **DESCRIPTION:** STANDING WATER WITH UNIDENTIFIED WHITE PARTICLES IN PIT AT FORMER OIL STORAGE AREAS. WATER CANNOT BE ALLOWED TO DISCHARGE TO STORM SYSTEM OR SURFACE WATERS.

THIS SPACE INTENTIONALLY LEFT BLANK.